

Ace Telephone Company of Michigan, Inc.
Ace Telephone Association
Request for Special Temporary Authority
Attachment 1

Response to Question 10:

Ace Telephone Company of Michigan, Inc. (“Ace Michigan”) and Ace Telephone Association (“ATA”), pursuant to 47 C.F.R. § 63.25, hereby request Special Temporary Authority (“STA”) for a period of 180 days for the continued provision of international service to customers pending consideration of a separately filed application for transfer of control (File No. ITC-T/C-20150922-00226) of the international Section 214 authorization (“Transfer Application”) for global resale service held by Westphalia Broadband, Inc. (“WBI”).

As detailed in the underlying Joint Application, in several transactions occurring in 2014 and 2015, Great Lakes Comnet, Inc. (“GLC”) issued new and additional shares of its common stock to its existing common shareholders. GLC holds international § 214 authority for global resale service. Prior to a stock issuance that occurred on October 6, 2014, no shareholder or entity had a fifty percent or greater ownership interest in GLC, either directly or indirectly. On October 6, 2014, Ace Michigan, as well as other GLC shareholders, purchased shares from GLC, and as a result of Ace Michigan’s stock purchase on this date it became the holder of approximately 51% of the common stock of, and thereby acquired a controlling interest in, GLC. Applying 47 CFR 63.03(d)(1) (footnote 1) and 47 CFR 63.09(b) (second sentence), as of October 6, 2014, ATA, as the parent company of Ace Michigan is also deemed to have acquired a controlling interest in GLC as a result of Ace Michigan’s stock acquisition. By virtue of Ace Michigan’s and ATA’s acquisition of a controlling interest in GLC, they also acquired a controlling interest in GLC’s wholly-owned subsidiaries, Clinton County Telephone Company (“CCTC”), Westphalia Telephone Company (“WTC”), Westphalia Broadband, Inc. (“WBI”), and Comlink, LLC (“Comlink”). GLC holds international § 214 authority for global resale service, and the transfer of control of GLC’s international § 214 global resale service authority is the subject of an application in File No. ITC-T/C-20150922-00227.

The transaction involved only Ace Michigan’s acquisition of a majority of GLC’s common stock, and did not result in a reduction or impairment of service to any customers of Ace Michigan, ATA, GLC, WTC, WBI, or Comlink. However, the Joint Applicants did not seek the FCC’s consent prior to the transfer of control, and are requesting this STA as part of a plan to correct any deficiency that may have resulted from this oversight. Grant of this STA is in the public interest as it will allow the continued provision of uninterrupted service to their customers.

Response to Question 12: Not Applicable.

Response to Question 16:

Section 63.18(d) – Ace Michigan does not currently hold any International § 214 Authorization.

Ace Michigan's parent company, ATA (ITC-214-20061101-00499), and ATA's wholly-owned subsidiary Ace Link Telecommunications, Inc. (ITC-214-19980710-00464), hold international § 214 authorizations. ATA also holds § 214 authority for domestic fixed satellite service (SES-REG-20060808-01329).

Section 63.18(e)(3) – Ace Michigan does not request any authorizations other than under Section 63.18(e)(2) of the Commission's rules.

Section 63.18(g) – Not Applicable.